



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUN 23 2015

CERTIFIED MAIL 7009 1680 0000 7662 5883
RETURN RECEIPT REQUESTED

Mr. Daniel Roddan
Director of Sales
Lamp Recyclers
3055 Holmgren Way
Green Bay, Wisconsin 54304

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Lamp Recyclers
EPA I.D. No.: WIR 000 144 113

Dear Mr. Roddan:

On May 14, 2014, a representative of the U.S. Environmental Protection Agency inspected the Lamp Recyclers facility located in Pewaukee, Wisconsin. As a large quantity universal waste handler, Lamp Recyclers is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Lamp Recyclers compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of universal waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Lamp Recyclers, EPA's review of records pertaining to Lamp Recyclers, and the inspector's observations, EPA has determined that Lamp Recyclers violated the following universal waste management requirements:

1. Universal Waste Labeling and Marking

Under Wisconsin Admin. Code § 673.34(5)[40 CFR § 273.34(e)], a large quantity handler of universal waste must clearly label or mark each lamp, container or package in which the lamps are contained with the phrase "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps."

At the time of the inspection, Lamp Recyclers did not label or mark each lamp, container or package with the phrase "Universal Waste—Lamps", "Waste Lamps" or "Used Lamps." Lamp Recyclers, therefore, violated the universal waste management requirement.

2. Universal Waste Accumulation Time

Under Wisconsin Admin. Code § 673.35(3)[40 CFR § 273.35(c)], a large quantity handler of universal waste must demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by doing any of the following:

- (a) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received.
- (b) Marking or labeling the individual item of universal waste (e.g., each battery or thermostat) with the date it became a waste or was received.
- (c) Maintaining an inventory system on-site that identifies the date the universal waste being accumulated became a waste or was received.
- (d) Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received.
- (e) Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received.
- (f) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

At the time of the inspection, Lamp Recyclers was unable to demonstrate, using any of the methods mentioned above, the length of time the lamps and batteries had been accumulated from the date it became a waste or was received. Lamp Recyclers, therefore, violated the universal waste management requirement.

3. Universal Waste Training

Under Wisconsin Admin. Code § 673.36[40 CFR § 273.36], a large quantity handler of universal waste must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.

At the time of the inspection, Lamp Recyclers did not offer documentation to demonstrate if designated employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies. Lamp Recyclers, therefore, violated the universal waste management requirement.

4. Universal Waste Management

Under Wisconsin Admin. Code § 673.33(4)(a)[40 CFR § 273.33(d)(1)], a large quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps. The containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

At the time of the inspection, Lamp Recycler's two containers of lamps were not closed and contained in a structurally sound and adequate containers. Lamp Recyclers, therefore, violated the universal waste management requirement.

5. Universal Waste Tracking Waste Shipments

Under Wisconsin Admin. Code § 673.39(1)[40 CFR § 273.39(a)], a large quantity handler of universal waste must keep a record of each shipment of universal waste received at the facility. The record may take the form of a log, invoice, manifest, bill of lading or other shipping document. The record for each shipment of universal waste received shall include all of the following information:

- (a) The name and address of the originating universal waste handler or foreign shipper from whom the universal waste was sent.
- (b) The quantity of each type of universal waste received (e.g., batteries, pesticides, thermostats, lamps).
- (c) The date of receipt of the shipment of universal waste.

A large quantity handler of universal waste must keep a record of each shipment of universal waste sent from the handler to other facilities. The record may take the form of a log, invoice, manifest, bill of lading or other shipping document. The record for each shipment of universal waste sent shall include all of the following information:

- (a) The name and address of the universal waste handler, destination facility or foreign destination to whom the universal waste was sent.
- (b) The quantity of each type of universal waste sent (e.g., batteries, pesticides, thermostats, lamps).
- (c) The date the shipment of universal waste left the facility. See, Wisconsin Admin. Code § 673.39(2)[40 CFR § 273.39(b)].

A large quantity handler of universal waste must retain the records for at least 3 years from the date of receipt of a shipment of universal waste and from the date a shipment of universal waste left the facility. See, Wisconsin Admin. Code § 673.39(3)(a)(b)[40 CFR § 273.39(c)(1)(2)].

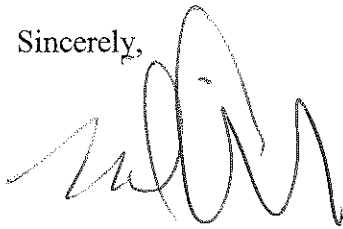
At the time of the inspection, Lamp Recyclers did not provide documentation to demonstrate records were retained for at least 3 years from the date of receipt of a

shipment of universal waste and from the date a shipment of universal waste left the facility. Lamp Recyclers, therefore, violated the universal waste management requirement.

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified period. Although this is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Cindy Dabner, United States Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Cindy Dabner, of my staff, at dabner.cindy@epa.gov or 312-886-5890.

Sincerely,

A handwritten signature in black ink, appearing to read "Victorine", written over a horizontal line.

for Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Dennis Mack, WDNR (Dennis.mack@wisconsin.gov)

Michael Ellenbecker, WDNR (michael.ellenbecker@wisconsin.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR8J
77 WEST JACKSON BLVD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: LAMP RECYCLERS


EPA ID NUMBER: WIR 000 144 113

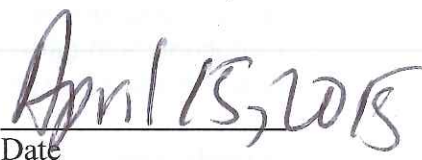
ADDRESS: W238 N1777 Rockwood Drive Street B, Pewaukee, Wisconsin
53188

DATE OF INSPECTION: August 14, 2014

EPA INSPECTOR: Cindy Dabner
Environmental Scientist

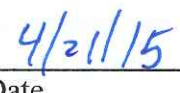
PREPARED BY:


Cindy Dabner
Compliance Section 2


Date

ACCEPTED BY:


Julie Morris, Chief,
Compliance Section 2


Date

Purpose of the Inspection

This inspection was an evaluation of Lamp Recycler's compliance with hazardous waste regulations found in the Wisconsin Administrative Code (WAC) and in Title 40 of the Code of Federal Regulations (40 CFR), Parts 260 through 279. Inspector Cindy Dabner of the U.S. Environmental Protection Agency Region 5 conducted the inspection. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation (CEI). The site notified as a universal waste large quantity handler.

Participants

U.S. Environmental Protection Agency-

Cindy Dabner, U.S. EPA Inspector U.S. EPA Region 5

dabner.cindy@epa.gov

Work Phone: 312-886-5890

Representative of Lamp Recyclers

Daniel Roddan, Director of Sales

3055 Holmgren Way Green Bay, Wisconsin 54304

dan.raddan@lamprecyclers.com

Cellphone: 920-680-1334

Office: 920-403-1166

Introduction

On August 14, 2014, Inspector Dabner arrived to the site at approximately 9:30 am. Inspector Cindy Dabner presented her federal identification and explained the purpose of the visit was to conduct a hazardous waste inspection.

During the opening conference, Inspector Dabner inquired about the required safety measures to conduct during the inspection tour. According to the facility representative, the typical standard safety equipment was all that was required. The standard safety equipment included steel-toed shoes and hard hat. No special safety measures were mentioned or identified to Inspector Dabner.

Inspector Dabner discussed during the opening conference, confidential business information (CBI) and the use of a camera during the inspection. The Lamp Recyclers representative did not make any CBI claims on: (1) the information provided to the inspector; or (2) photographs taken during the inspection.

Site Description

Lamp Recyclers, Inc. is based in Green Bay, Wisconsin and provides specialized recycling services to commercial, governmental and industrial customers throughout the Midwest region. Lamp Recyclers operates as a 10 day transfer facility and stores universal waste at the Warren

Electric Supply Warehouse. The owner of Warren Electric Supply Warehouse also owns Lamp Recyclers.

Lamp Recyclers stores universal waste, specifically spent lamps, batteries, light ballasts, and electronics (televisions, computer equipment) using 1,750 square feet at the Warren Electric Supply Warehouse. Two employees are employed with Lamp Recyclers. The transfer facility at Warren Electric Supply Warehouse operates Monday through Friday.

Universal Waste Generation

Lamp Recyclers stores spent lamps, batteries, light ballasts, and electronics (televisions, computer equipment). Lamp crushing activities are not conducted at the Warren Electric Supply Warehouse. Universal waste is transported from the Warren Electric Supply Warehouse facility to the Lamp Recyclers base facility that is located in Green Bay, Wisconsin. At the Lamp Recycler Base Facility, lamp crushing activities are conducted.

Site Tour

The site inspection began at a 1750 square foot area of the Warren Electric Supply Warehouse where universal waste is stored. Generally, the inspector observed universal stored in structurally sound containers that were closed, marked with accumulation start dates, and labeled with the words "universal waste." However, the inspector observed some containers of universal waste not labeled or marked with the words "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste:"

- Photograph#13-14 – Lamps
- Photograph#20 – Lamps
- Photographs#26 –Lamps
- Photographs#31-33 – Lamps

The inspector also observed the following universal wastes not labeled with the earliest date that the universal waste was generated or received:

- Photograph#13-14 – Lamps
- Photograph#20 – Lamps
- Photograph#23-24 – Batteries
- Photographs#31-33 – Lamps
- Photographs#34-35 – Batteries

Finally, the inspector observed the following universal waste not placed in closed containers:

- Photograph#13-14 – Lamps
- Photographs#31-33 – Lamps

Record Review

A records review was conducted during and after the inspection. The inspector requested to review training records and universal waste shipments receipts. The following items were observed as the result of the record review:

Universal Waste Handler Status:

Large Universal Waste Handler

Personnel Training Records:

Documentation that employees were trained on the proper handling of universal waste as well as emergency procedures appropriate for the types of waste handled at the facility was not provided.

Universal Waste Shipment Records:

Shipment records for the last three years (2014, 2013, and 2012) were not forwarded for review.

Closing Conference

A closing conference was conducted. The inspector summarized notes taken during the inspection. Inspector Dabner explained how the observation notes would be reviewed and used to generate an inspection report. Inspector Dabner briefly discussed EPA's procedures for following up with the facility representative after conducting an inspection.

Post-Inspection

Supplementary information was not provided following the inspection.

Attachments

- A. Lamp Recyclers Photographs
- B. Lamp Recyclers Checklist
- C. Lamp Recyclers Documentation Log

ATTACHMENT A

Lamp Recyclers Photographs

WIR 000 125 831

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



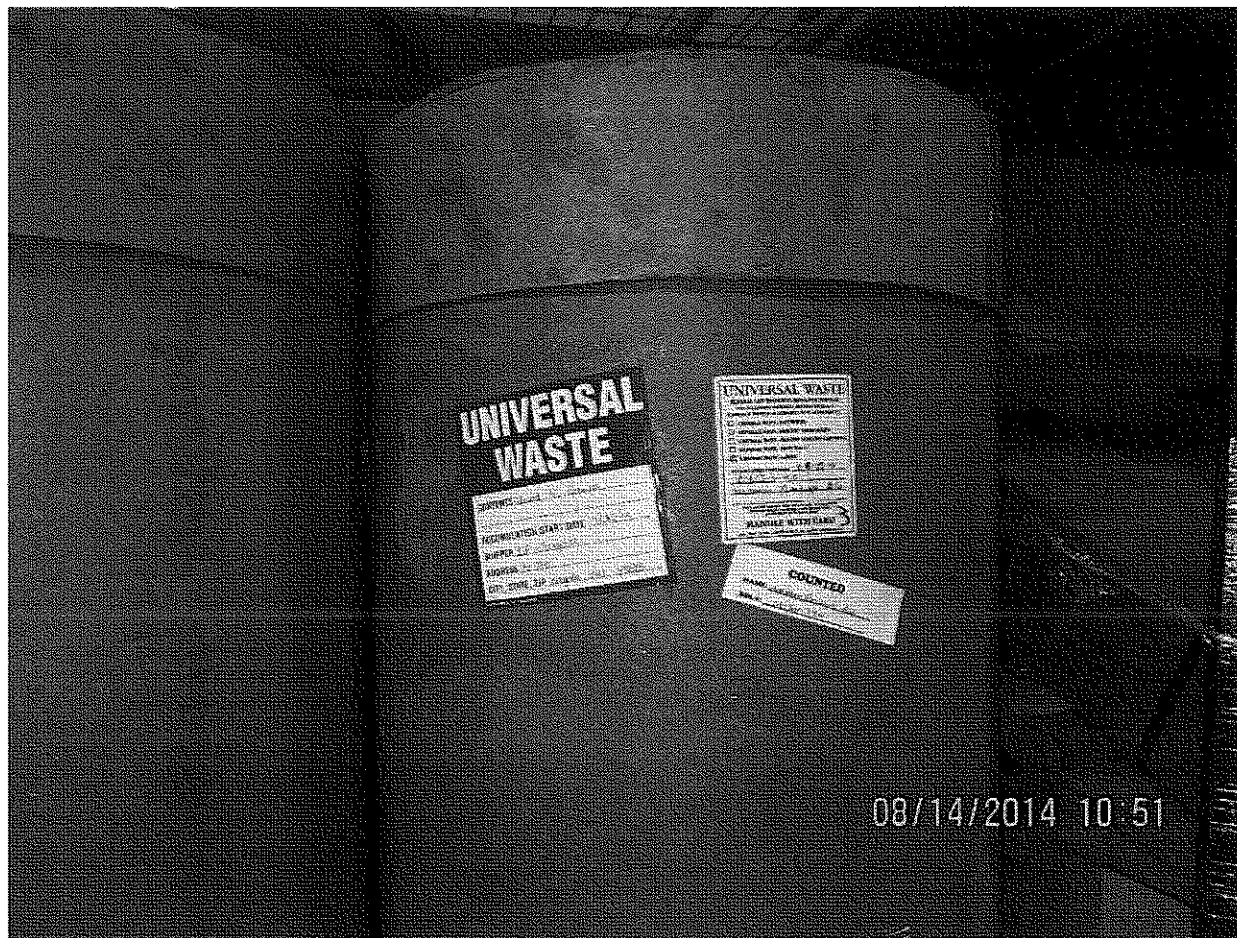
Photograph: #1
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Photograph of the Facility Sign

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #2
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Photograph of the Facility Sign

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #3

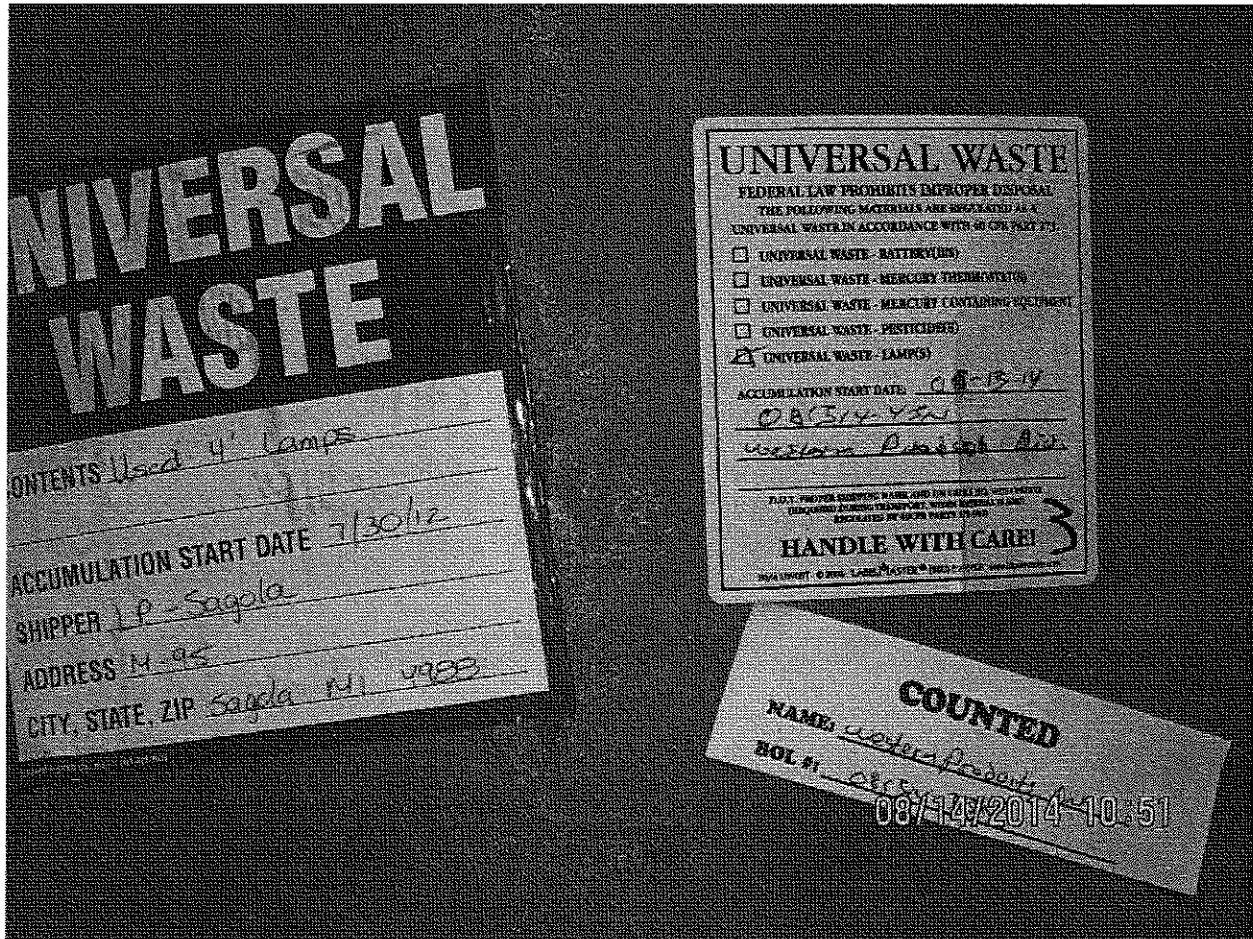
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

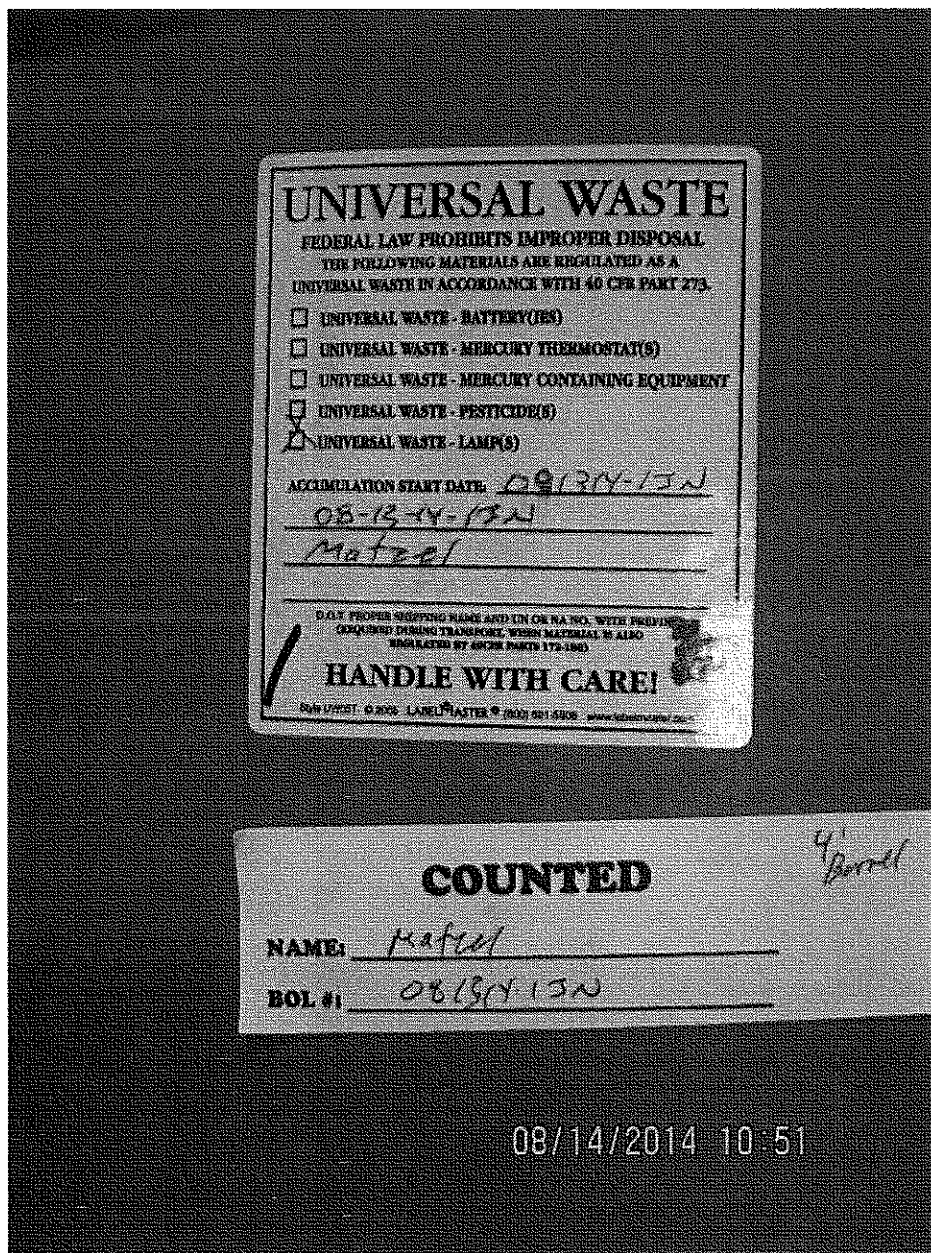
Description: Universal Waste Lamps 08-15-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #4
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps Label 08-15-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #5

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

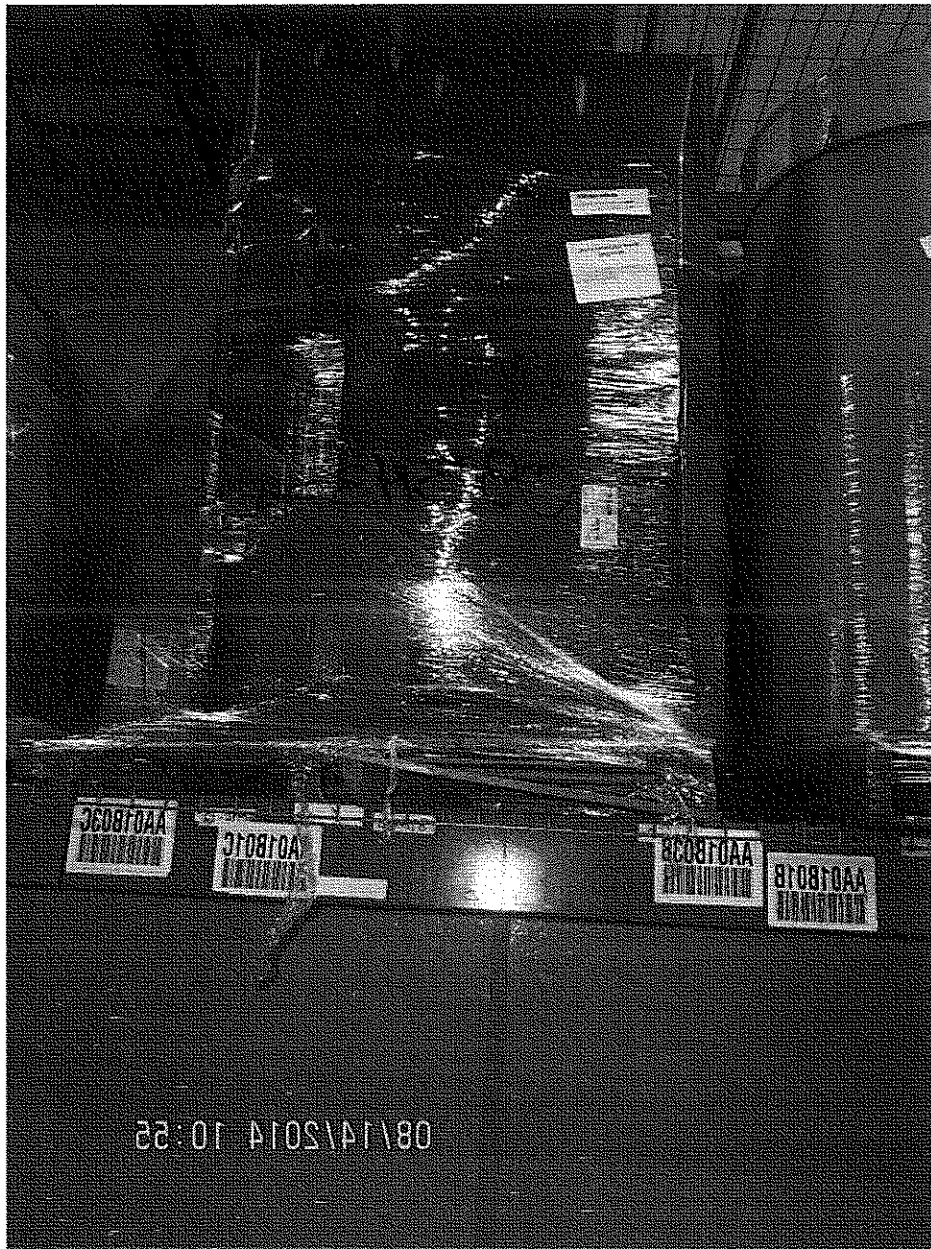
Description: Universal Waste Lamps 08-12-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #6
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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August 14, 2014



Photograph: #7

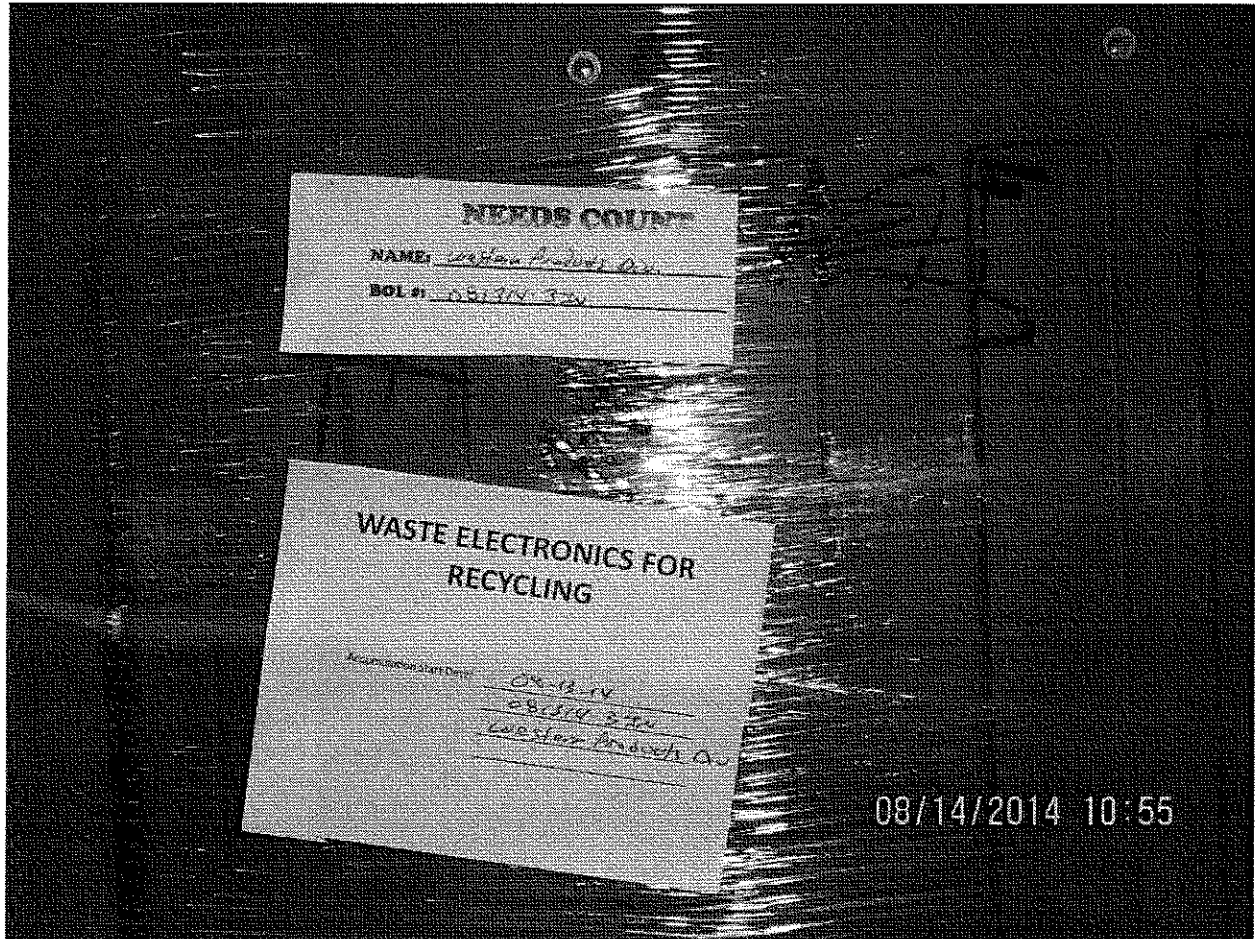
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

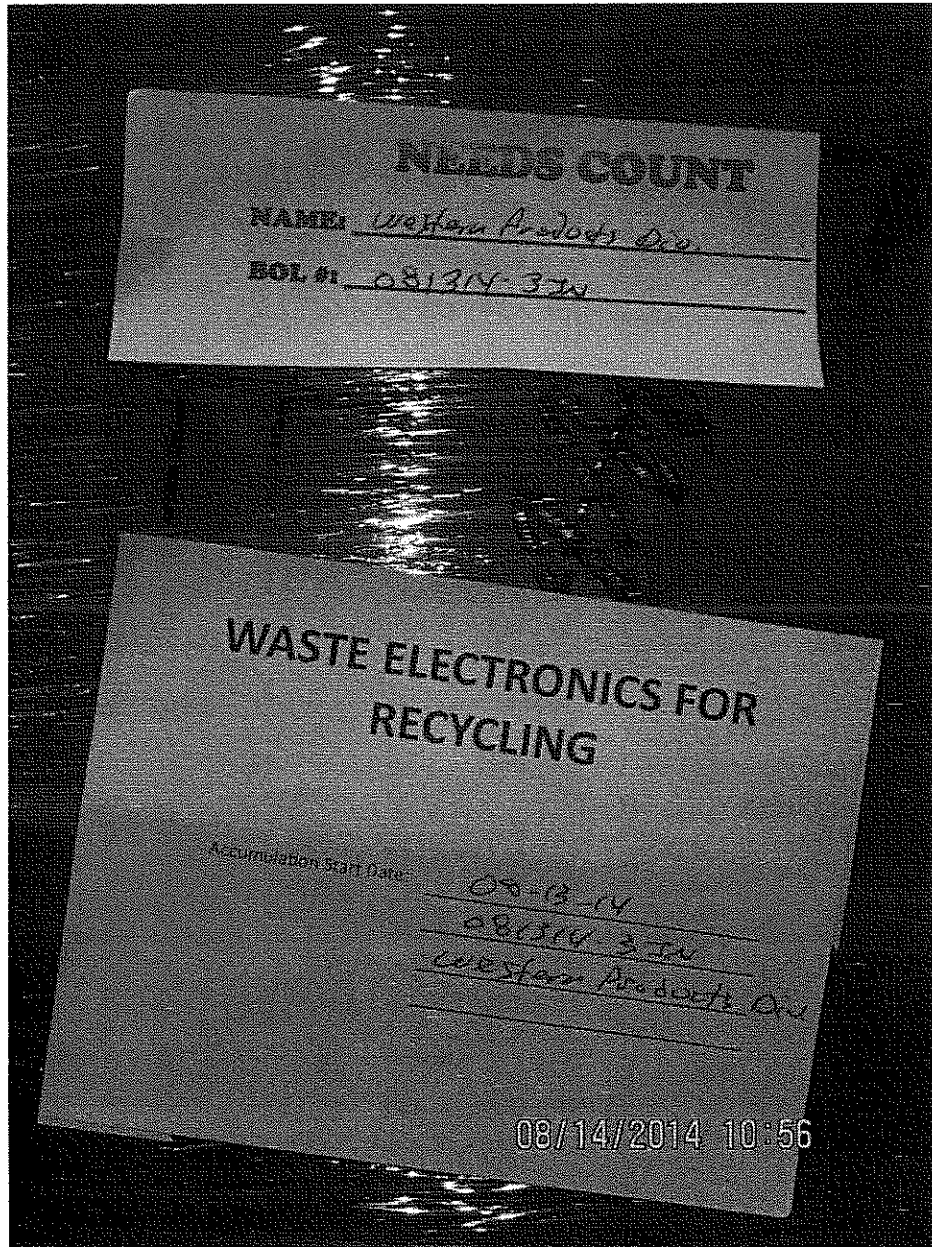
Description: Universal Waste Electronics

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #8
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Electronics 08-13-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #9
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Electronics 08-13-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #10

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

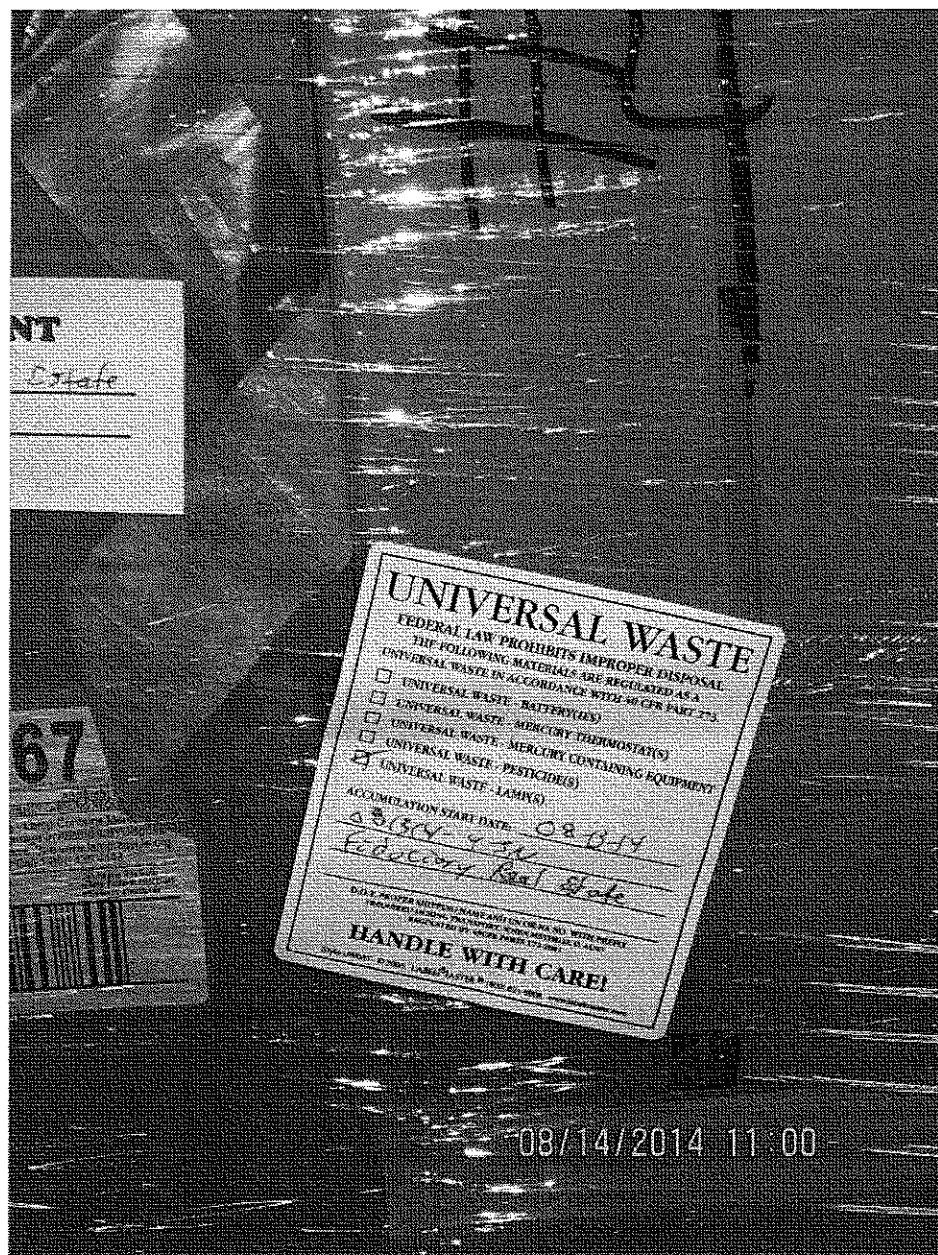
Description: Universal Waste Lamps 08-13-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #11
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps 08-13-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #12
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps 08-13-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #13
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps 08-13-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #14
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps not Labelled

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #15

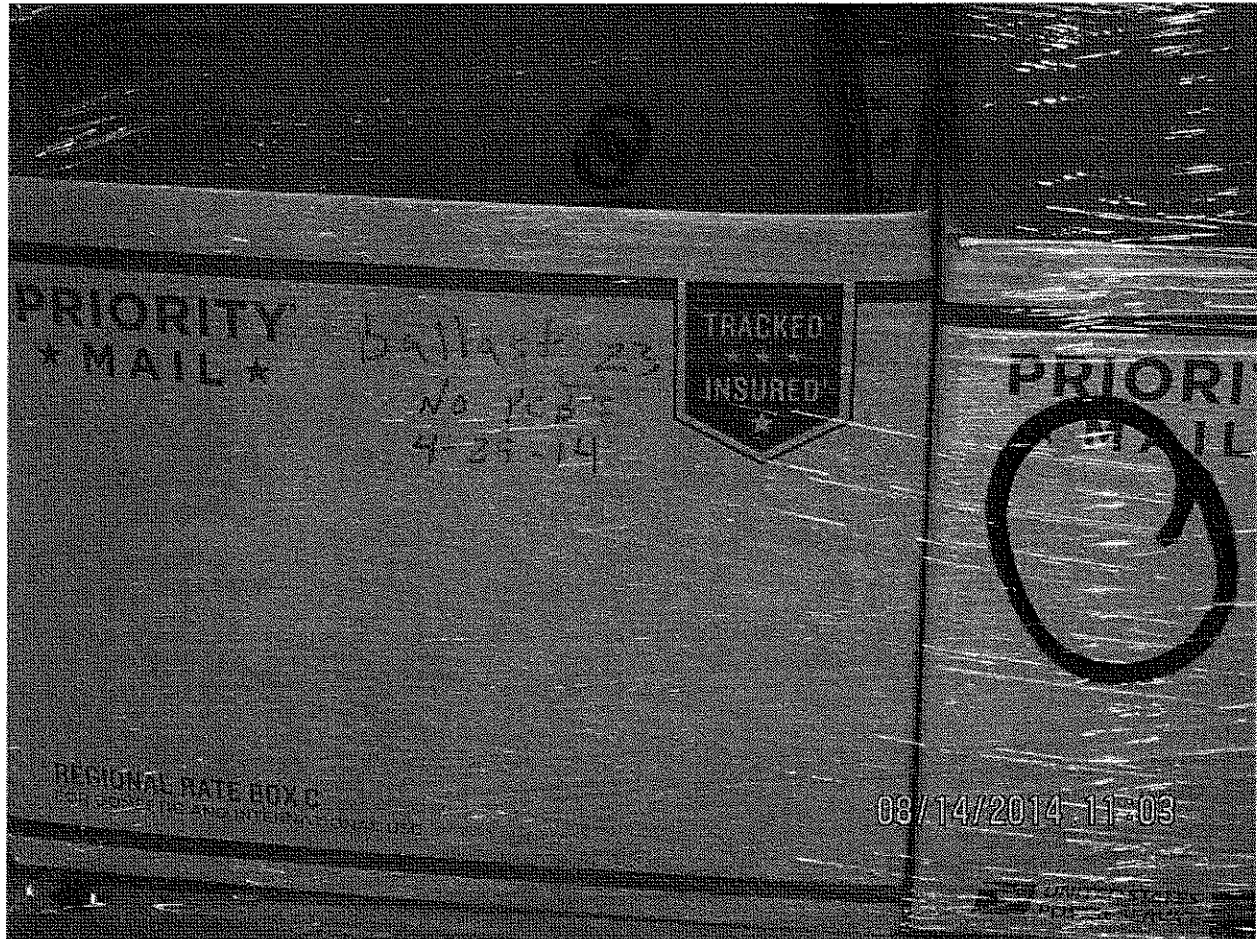
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

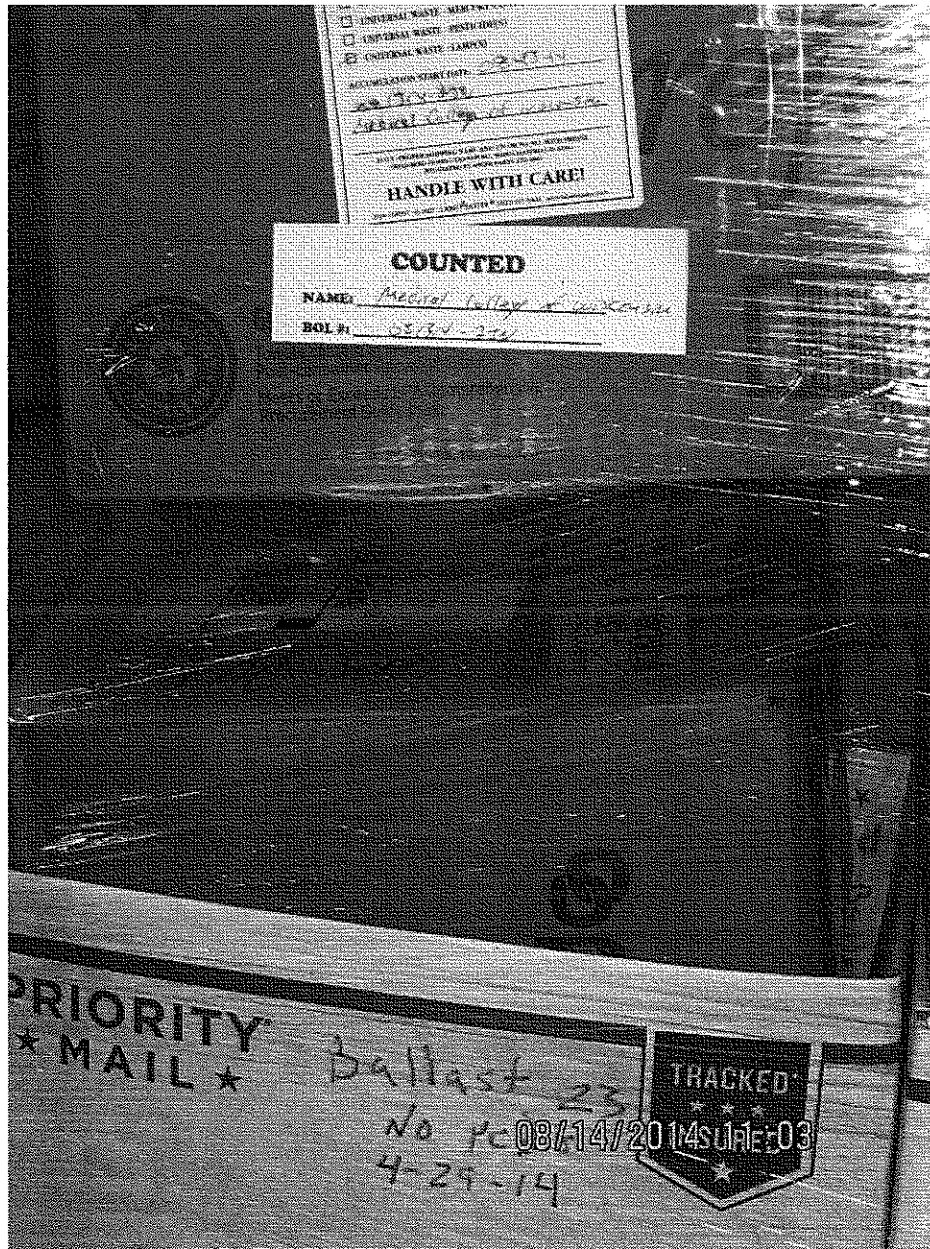
Description: Universal Waste Lamps 08-13-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #16
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Ballast 04-29-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #17

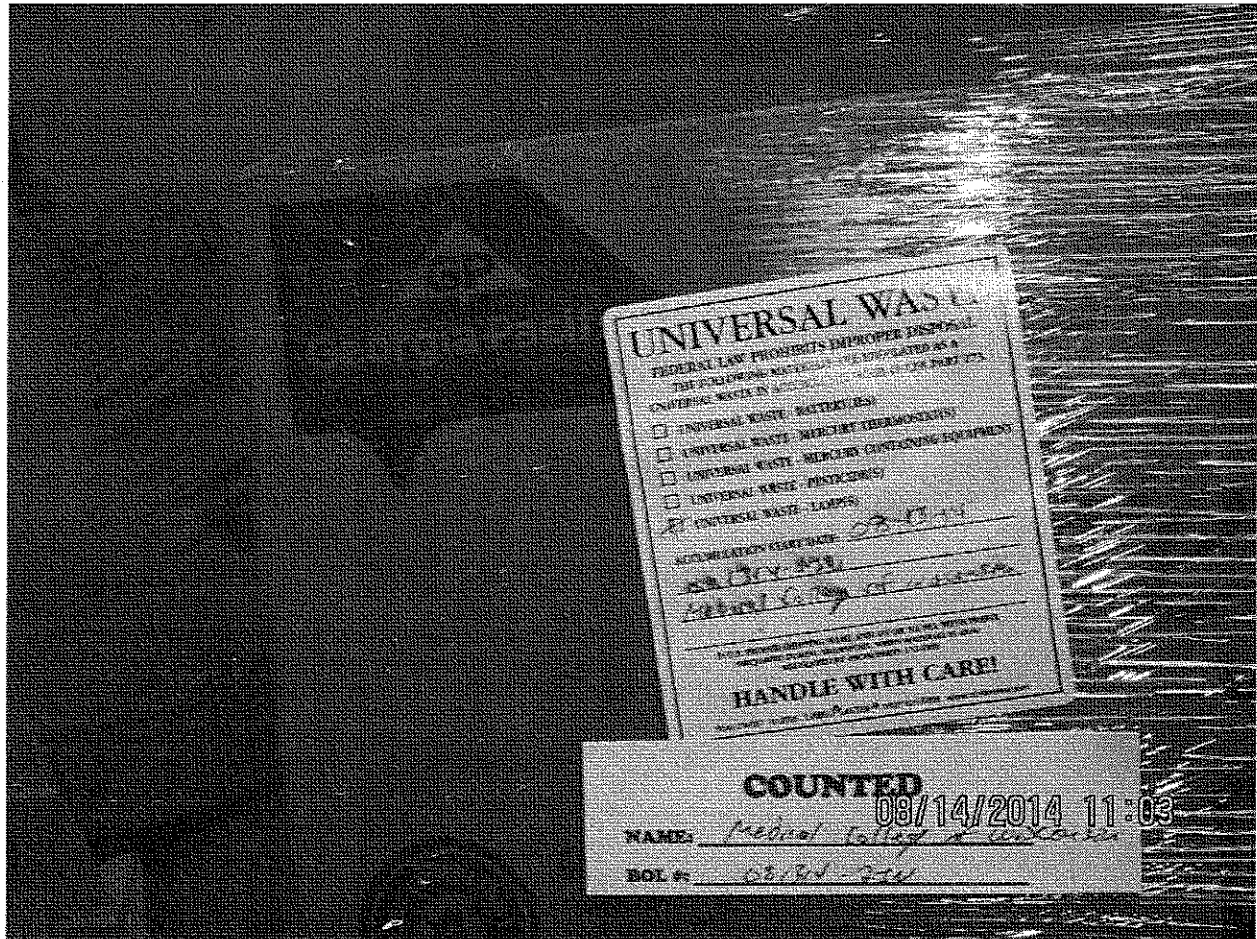
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Lamps 08-13-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #18

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Lamps 08-13-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #19

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Ballast 02-14-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #20
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste –Not Labelled

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #21
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste –Electronic Label Accumulation Date not Clearly Visible

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #22

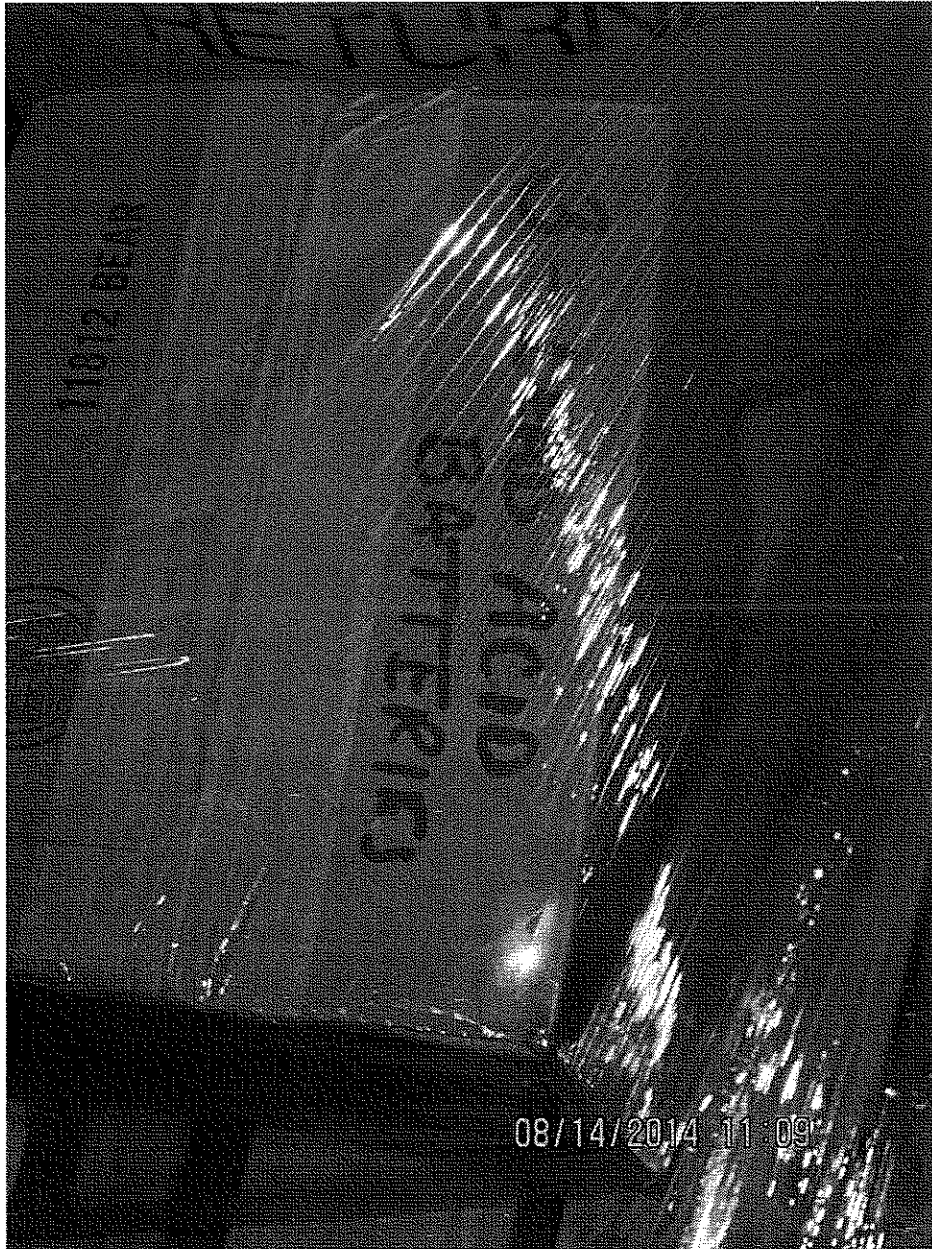
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Lamp

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #23

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Batteries without an Accumulation start date

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #24

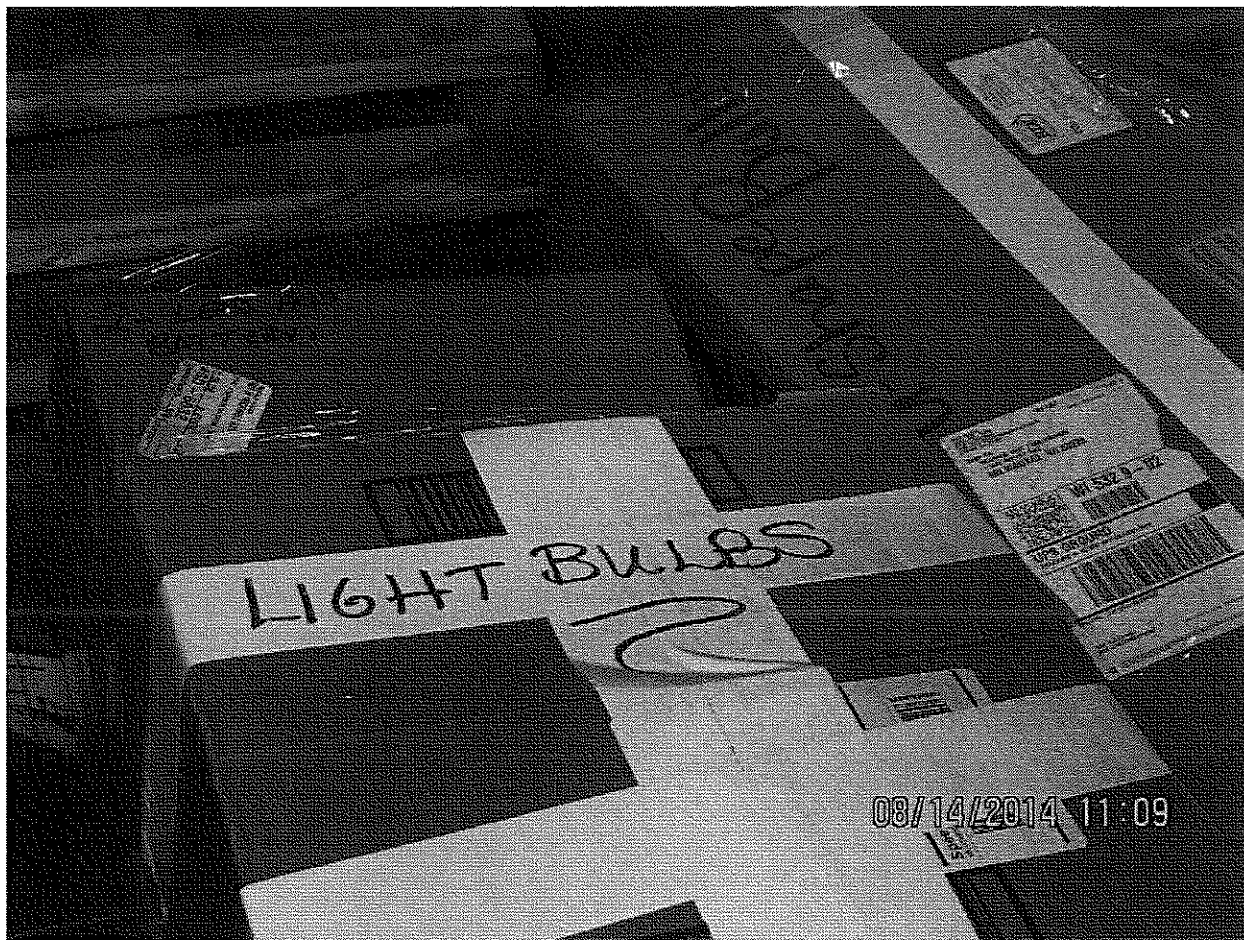
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Batteries without an Accumulation start date

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #25

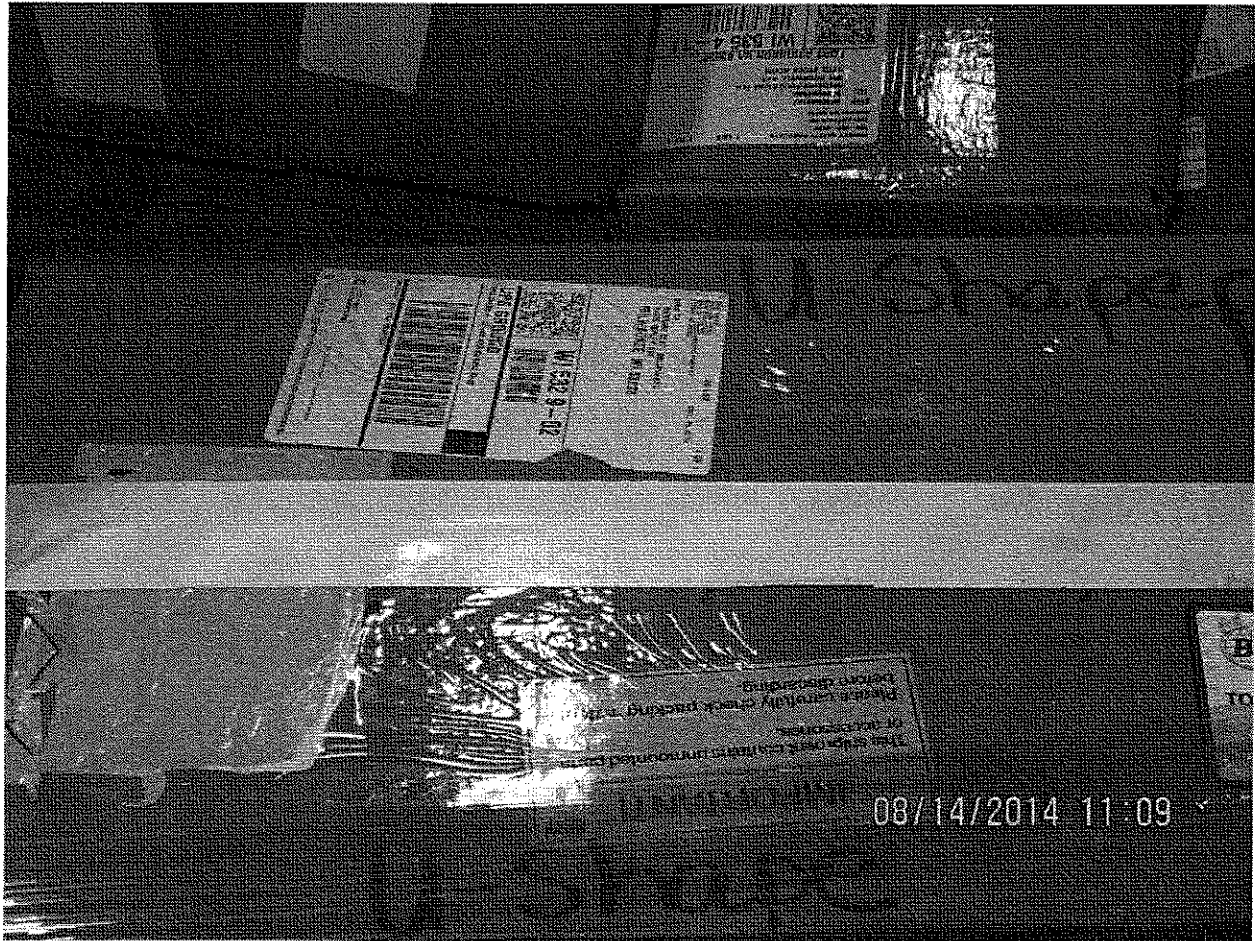
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

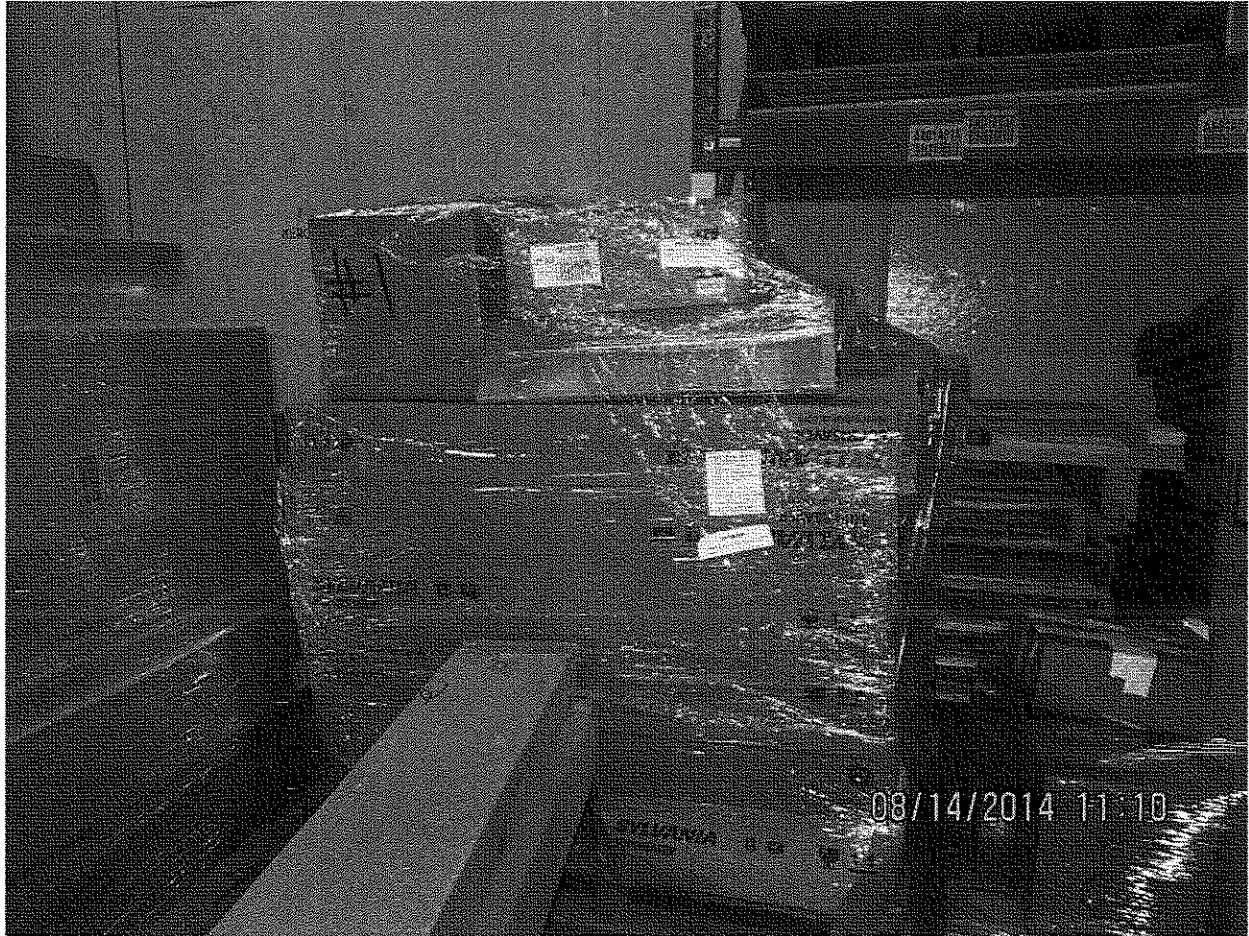
Description: Universal Waste Light Bulbs

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



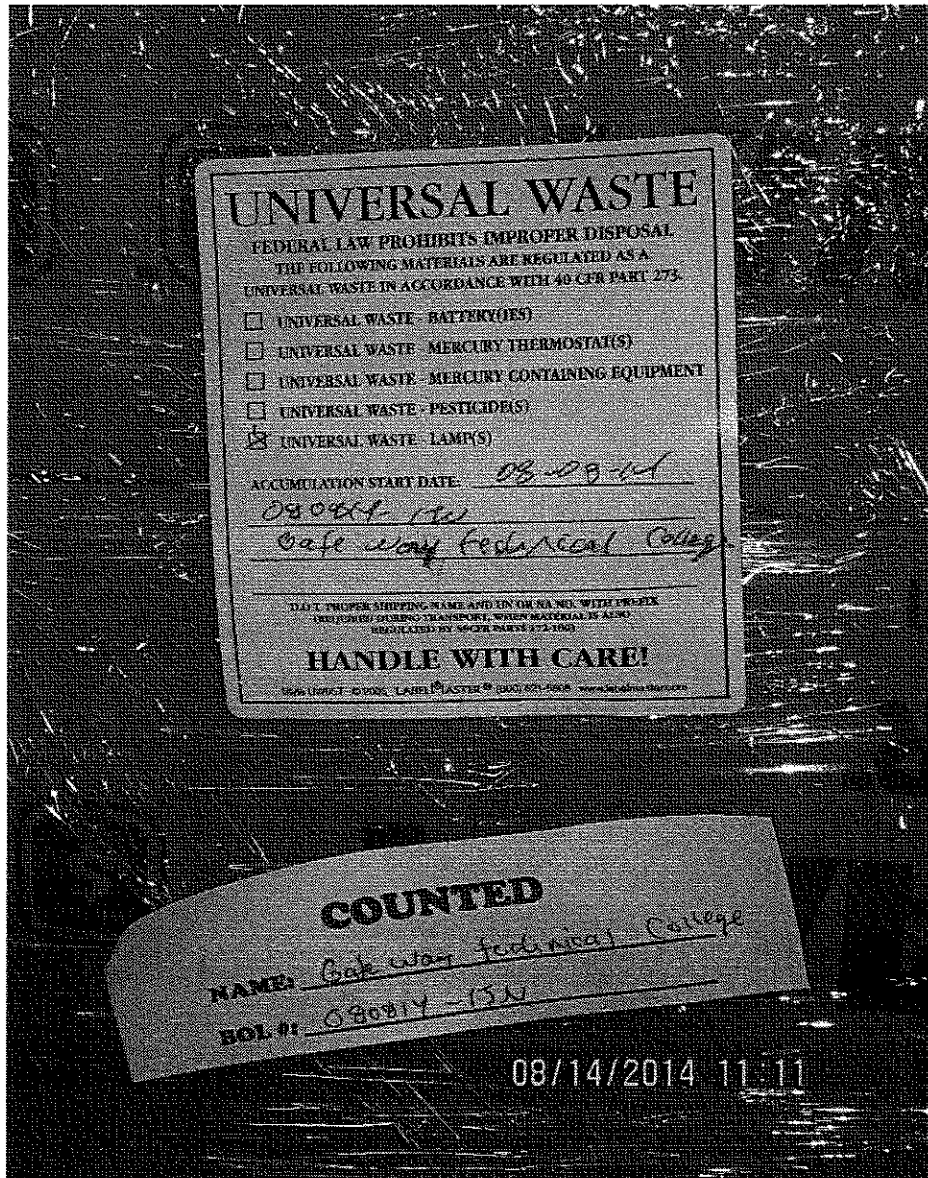
Photograph: #26
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #27
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps 08-08-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #28
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps 08-09-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #29
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



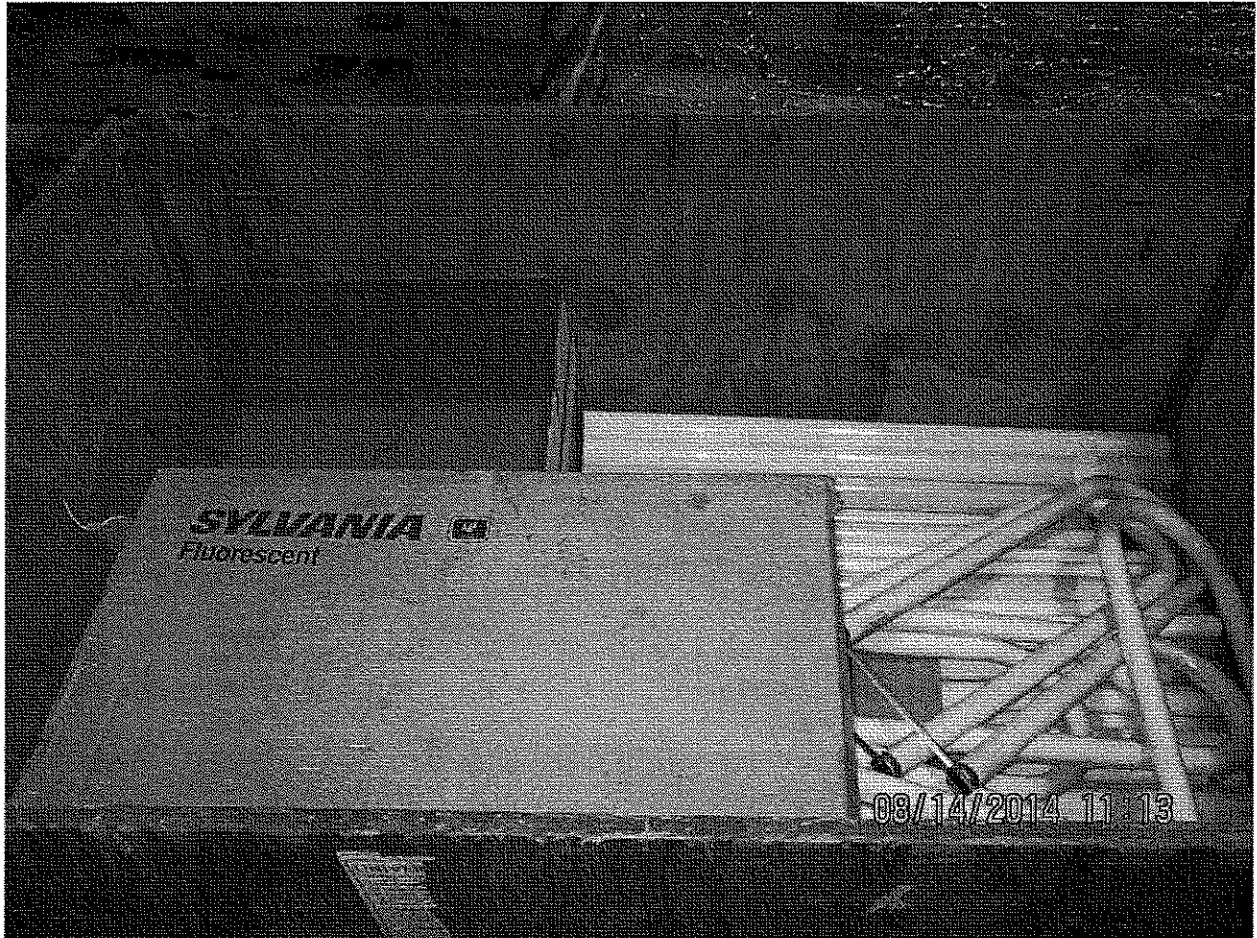
Photograph: #30
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #31
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamp Container not Labelled or Closed

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #32

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Lamp Container not Labelled or Closed

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #33
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #34

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Batteries not Closed and without Accumulation start Date

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #35

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Batteries not Closed and without Accumulation start Date

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #36
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamp 08-06-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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August 14, 2014



Photograph: #37

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

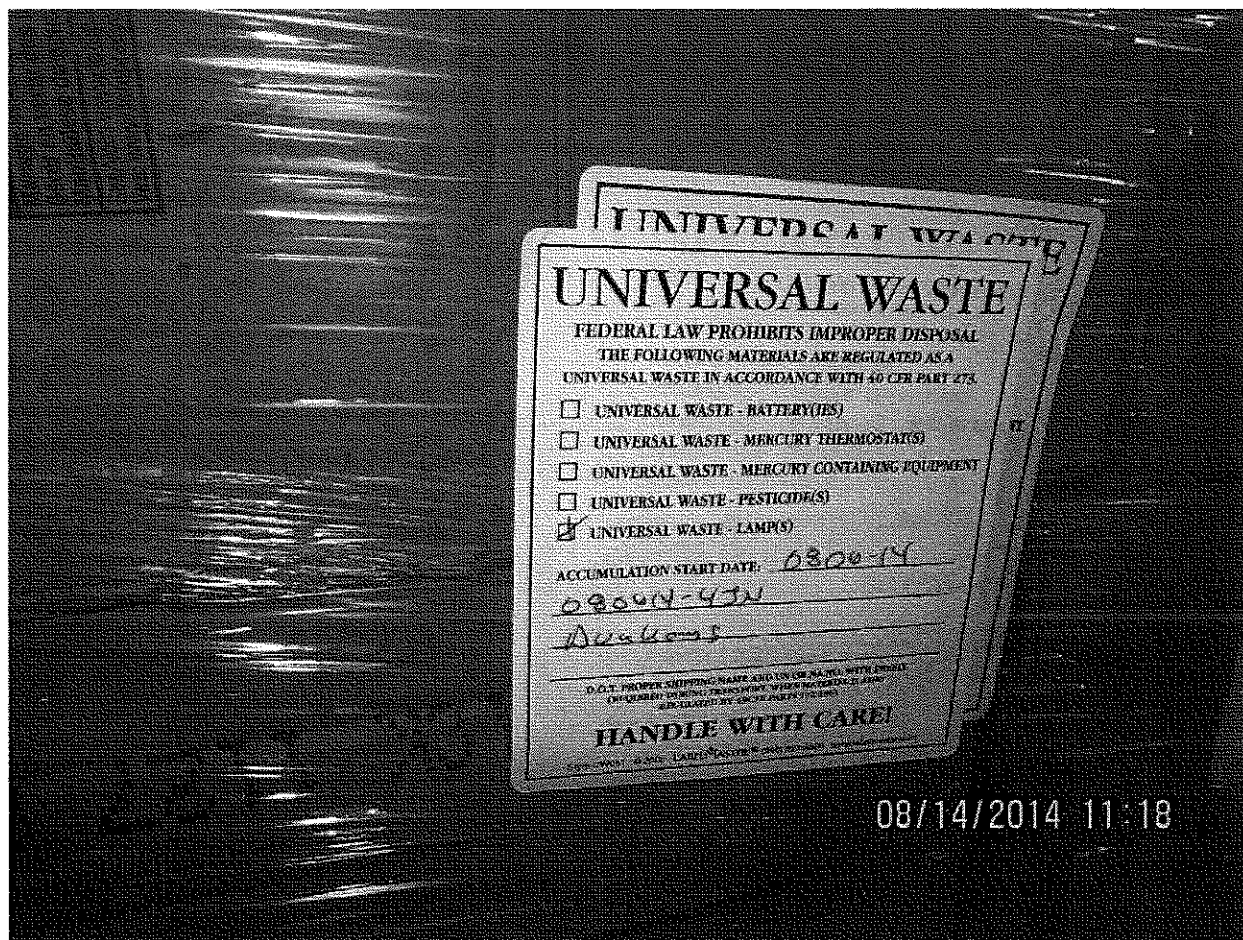
Description: Universal Waste Lamps 08-06-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #38
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps 08-06-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #39

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Lamps 08-06-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #40

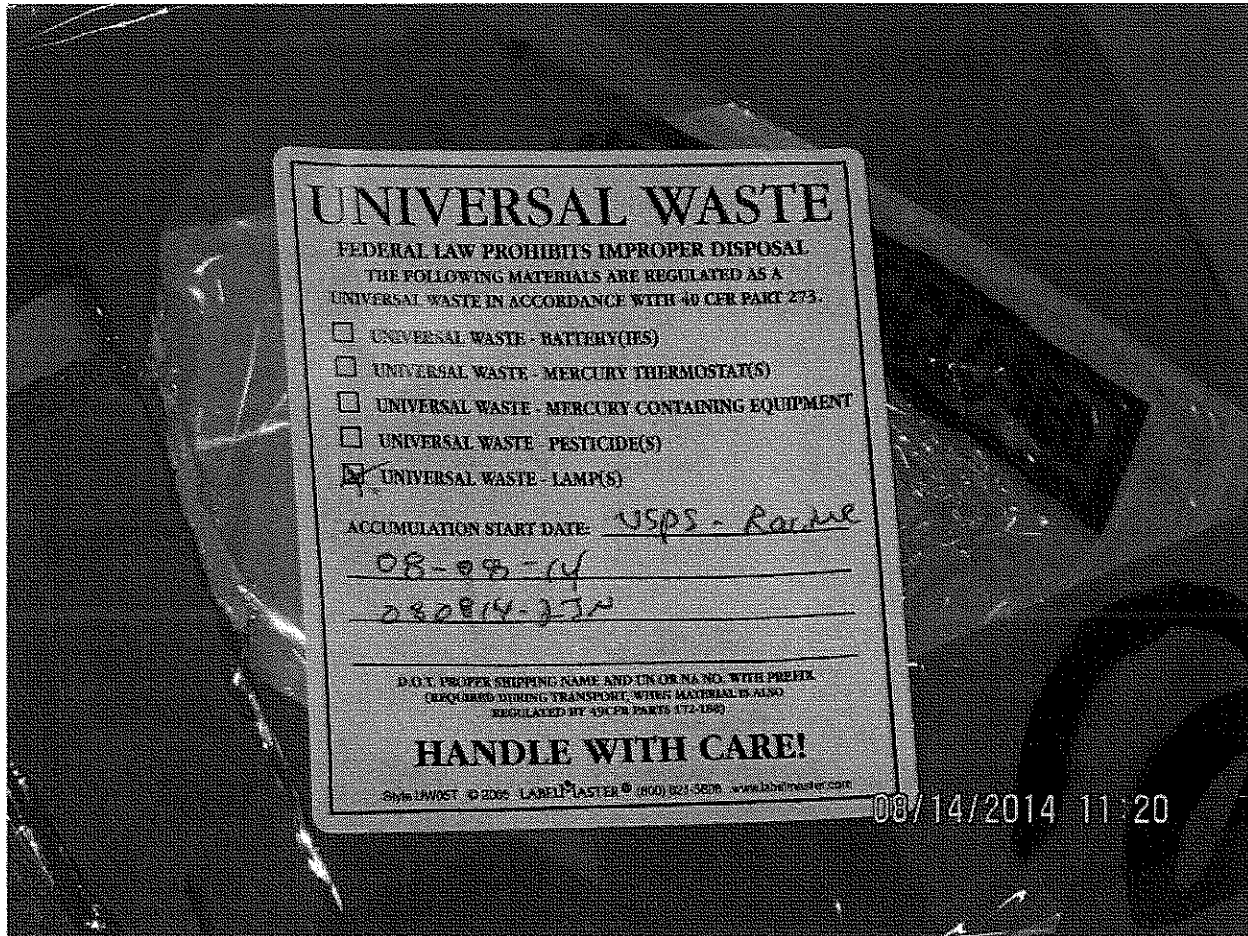
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Lamps 08-08-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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August 14, 2014



Photograph: #41
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps 08-08-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #42
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Electronics & Lamps

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #43

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Electronics & Lamps

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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August 14, 2014



Photograph: #44

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Electronics

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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August 14, 2014



Photograph: #45

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Electronics

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



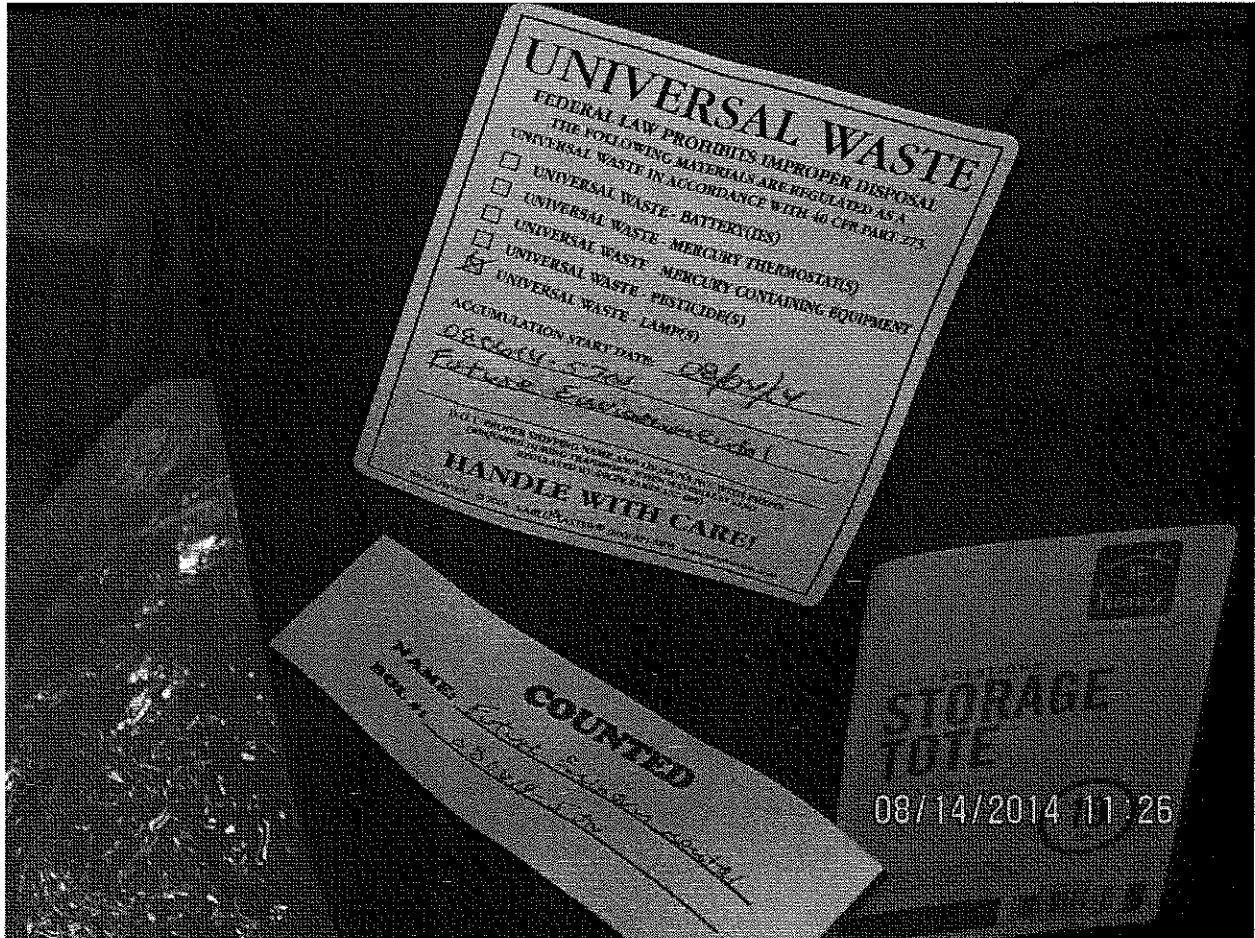
Photograph: #46
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps not Closed

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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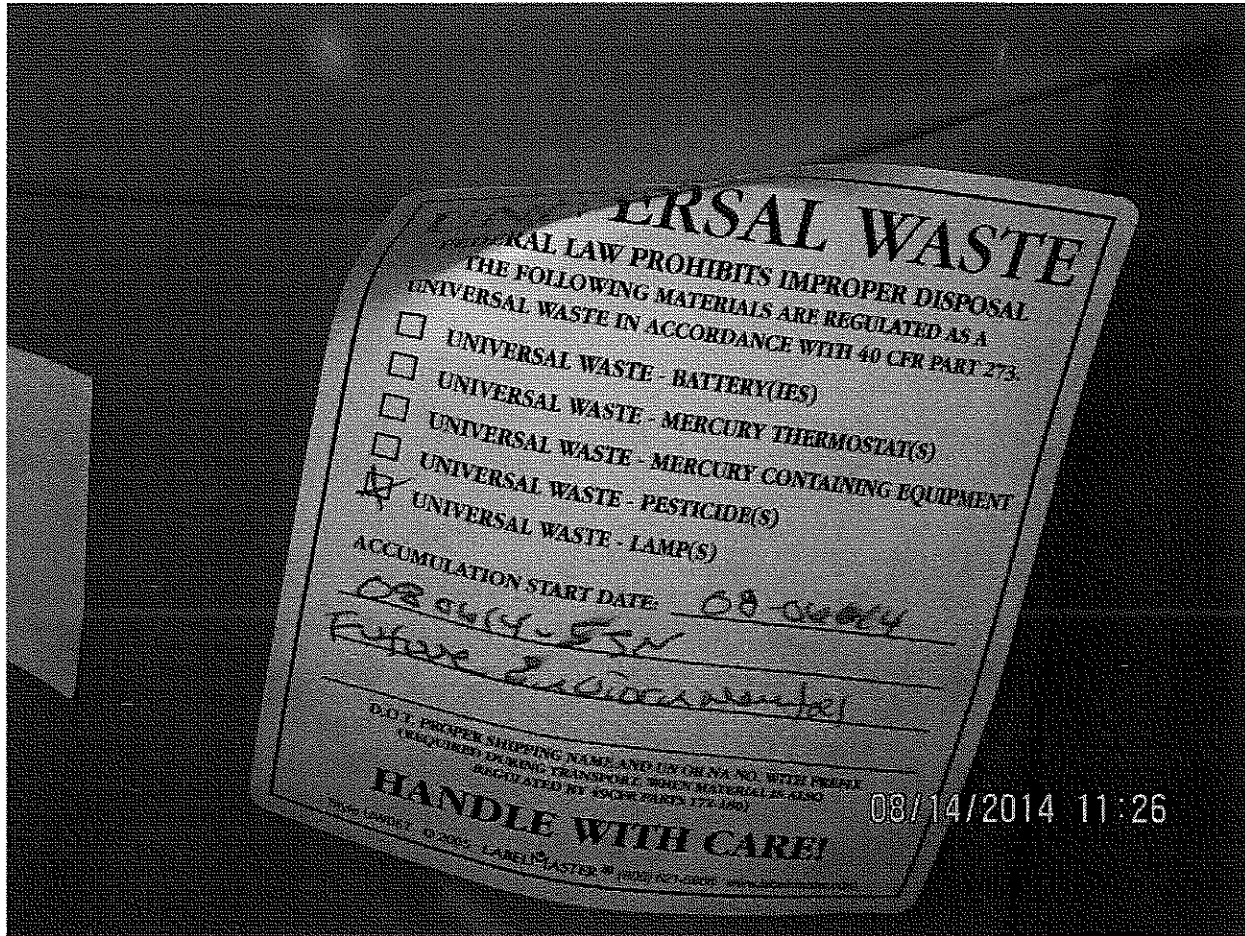
Photograph: #47
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps not closed

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
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Photograph: #48
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamp Label closed 08-06-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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Photograph: #49

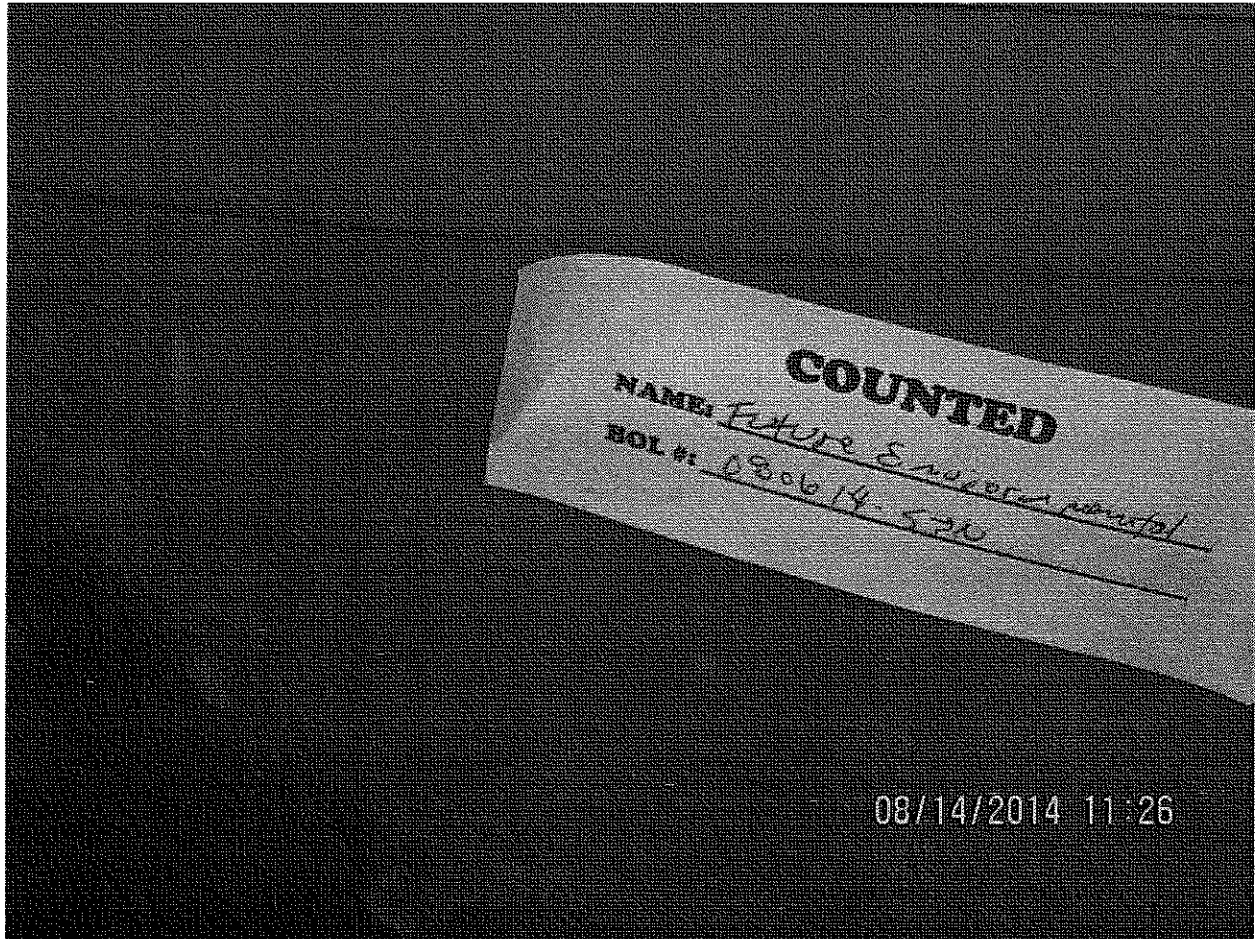
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Lamp Label closed 08-06-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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Photograph: #50
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamp Label

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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Photograph: #51
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Lamps & Batteries

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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Photograph: #52

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Lamps and Batteries 08-06-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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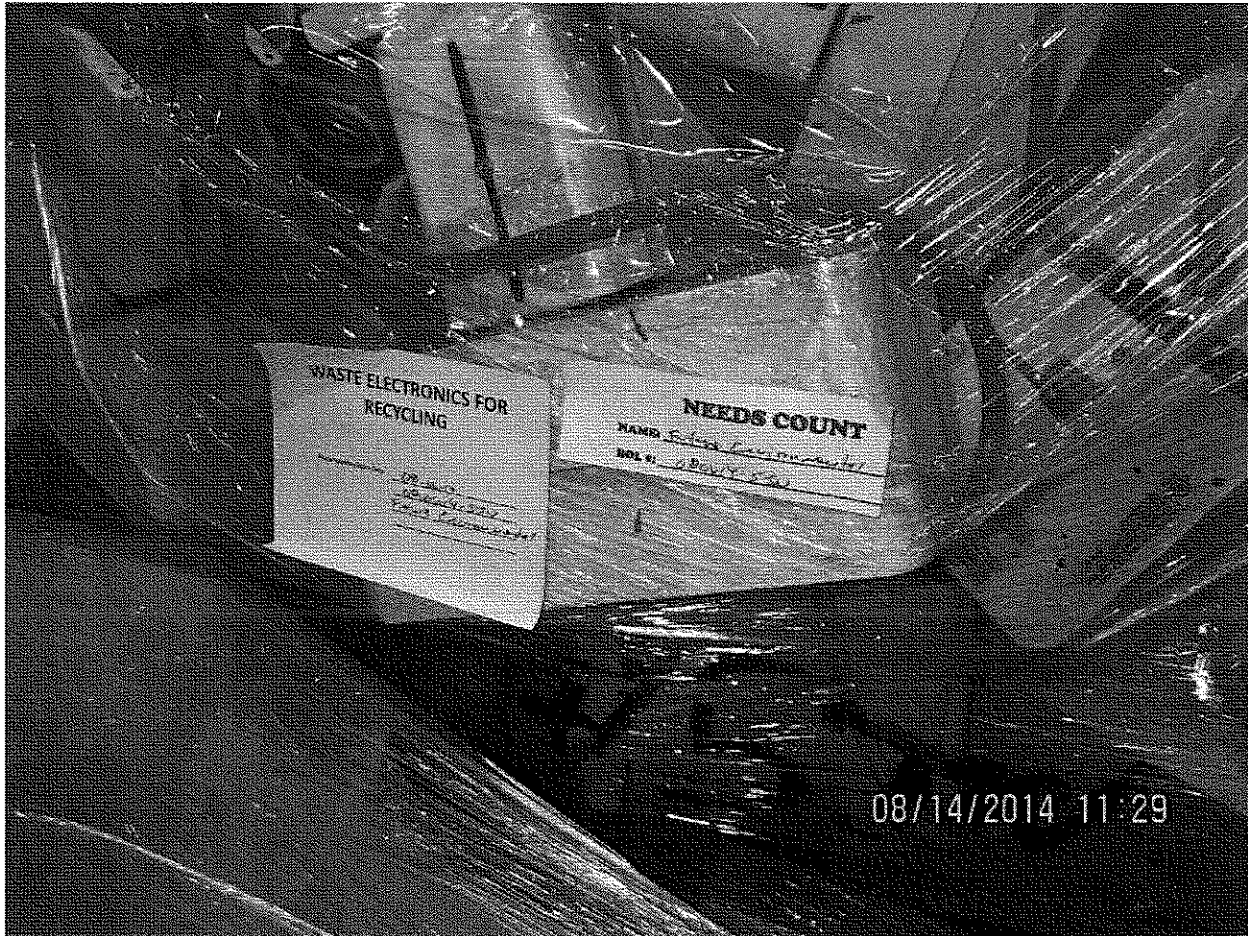
Photograph: #53
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Electronics 08-06-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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Photograph: #54
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Electronics 08-06-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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Photograph: #55

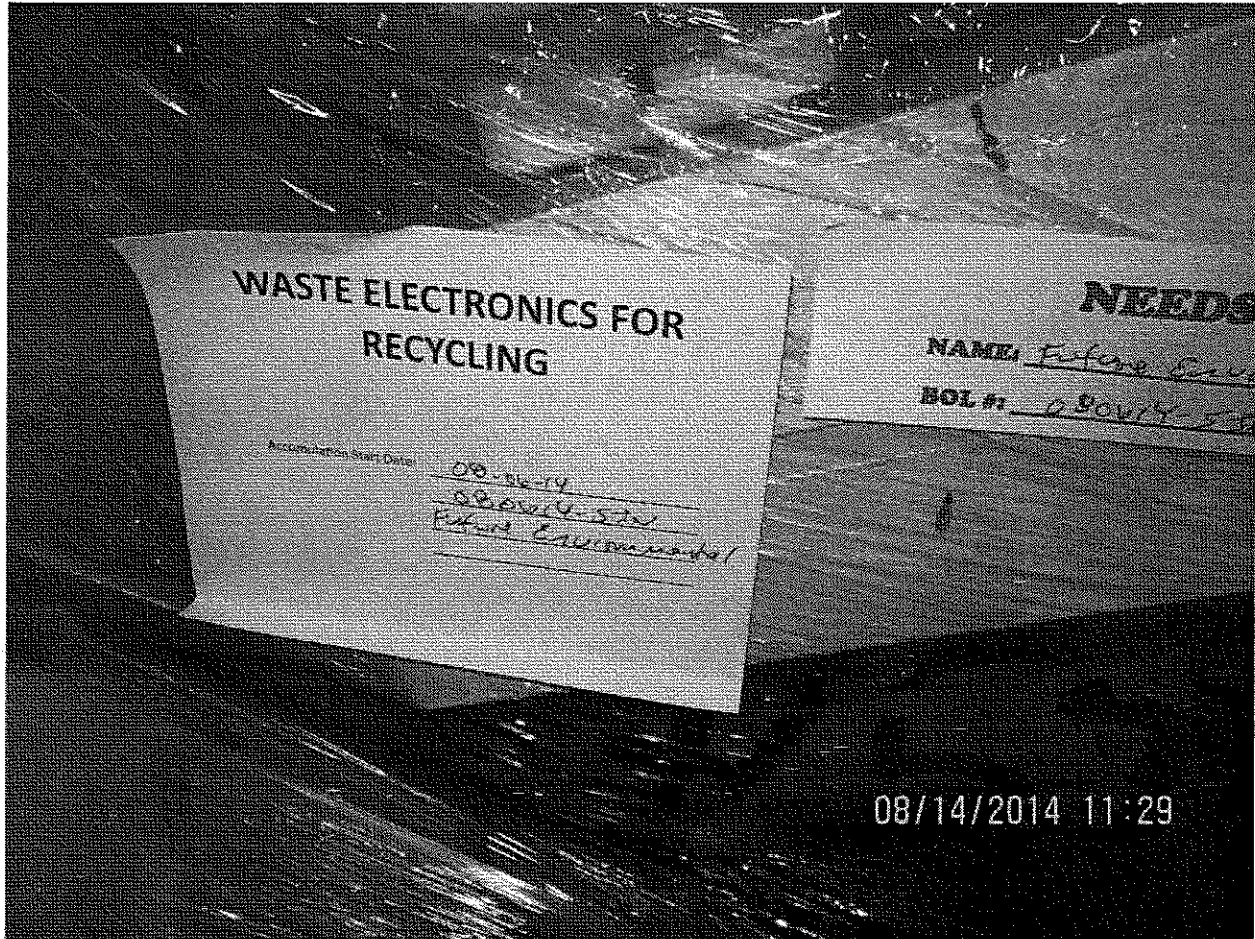
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Universal Waste Electronics 08-06-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
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August 14, 2014



Photograph: #56
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Universal Waste Electronics 08-06-14

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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Photograph: #57

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Lamp Recycler Storage Area View

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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Photograph: #58
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Lamp Recycler Storage Area View

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
Pewaukee, WI
August 14, 2014



Photograph: #59

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Lamp Recycler Storage Area View

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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August 14, 2014



Photograph: #60

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 14, 2014

Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI

Description: Lamp Recycler Storage Area View

Attachment A
Photographs for Lamp Recyclers
WIR 000 144 113
W238 N1777 Rockwood Dr. Street B
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Photograph: #61
Name of Photographer: Cindy Dabner
Date/Time of Photograph: August 14, 2014
Site Location: W238 N1777 Rockwood Dr. Street B Pewaukee, WI
Description: Lamp Recycler Storage Area View

ATTACHMENT B

Lamp Recyclers Checklist

WIR 000 125 831



Revision: 10/10/2011
WASTE & MATERIALS
MANAGEMENT PROGRAM

UNIVERSAL WASTE HANDLER INSPECTION REPORT - LARGE QUANTITY HANDLER

This Inspection Form, used for the inspection of facilities that generate or handle 5000 kg or more of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: Prohibitions

A. Universal waste is not disposed on-site.	N	673.31(1)	Photo <input type="checkbox"/>
B. Universal waste is not diluted or treated on-site.	N	673.31(2)	Photo <input type="checkbox"/>

Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.

Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	N	673.33	Photo <input type="checkbox"/>
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.		673.33	Photo <input type="checkbox"/>
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	NA	673.33(1)(b)	Photo <input type="checkbox"/>
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	N	673.33	Photo <input type="checkbox"/>
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed in a manner that prevents breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are cleaned up immediately. 4. Removal is performed in a well ventilated, monitored environment.	NA	673.33(3)(b)	Photo <input type="checkbox"/>
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	NA	673.33(2)	Photo <input type="checkbox"/>
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	NA	673.33(2)	Photo <input type="checkbox"/>
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N	673.34	Photo <input type="checkbox"/>
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	NA	673.34	Photo <input type="checkbox"/>
J. Length of accumulation time is demonstrated by ANY of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	N	673.35(3)	Photo <input type="checkbox"/>
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	N	673.35(1)	Photo <input type="checkbox"/>



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UNIVERSAL WASTE HANDLER INSPECTION REPORT - LARGE QUANTITY HANDLER

Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N	673.35(2) Photo <input type="checkbox"/>
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	N	673.36 Photo <input type="checkbox"/>
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	NI	673.37 Photo <input type="checkbox"/>
O. EPA ID# was obtained before meeting or exceeding 5,000 kg (11,025 lb).	Y	673.32(1) Photo <input type="checkbox"/>

Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	Y	673.38(1) Photo <input type="checkbox"/>
B. Handler that self-transportes complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	NI	673.38(2) Photo <input type="checkbox"/>
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	NI	673.38(3) Photo <input type="checkbox"/>
D. If shipping to another universal waste handler, the handler has agreed to receive the shipment.	NI	673.38(4) Photo <input type="checkbox"/>
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	NI	673.38 Photo <input type="checkbox"/>
F. The handler immediately notifies the Department if they receive a shipment containing hazardous waste.	NI	673.38(7) Photo <input type="checkbox"/>
G. Nonhazardous, nonuniversal waste in a universal waste shipment is managed in compliance with the solid waste requirements.	NI	673.38(8) Photo <input type="checkbox"/>

Section 4: Record Keeping

A. Records for each shipment of universal waste received at the facility contains ALL of the following information: 1. The name and address of the originating handler or foreign shipper. 2. The quantity of each type of universal waste received. 3. The date the shipment was received.	N	673.39(1) Photo <input type="checkbox"/>
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UNIVERSAL WASTE HANDLER INSPECTION REPORT - LARGE QUANTITY HANDLER

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WASTE & MATERIALS
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Section 4: Record Keeping

B. Records for each shipment of universal waste sent off-site contains the following information

1. The name and address of the facility to which the waste was sent.
2. The quantity of each type of universal waste sent.
3. The date the shipment of universal waste left the facility.

C. Records are retained for at least 3 years from the date the shipment was received or from the date the shipment left the facility.

[Handwritten signature]

673.39(2)

Photo ☐

673.39(3)

Photo ☐

ATTACHMENT C

Lamp Recyclers Supporting Documentation

WIR 000 125 831

Lamp Recyclers Supporting Documentation OH7 751 724 312

Date Provided: August 14, 2014

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